

**THE CHARRINGTON FIRM, P.C.** Attorneys and Counselors at Law

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June 10, 2024

**VIA E-MAIL**

Jamie S. Felsen, Esq.  
Emanuel Kataev, Esq.  
MILMAN LABUDA LAW GROUP PLLC  
3000 Marcus Avenue  
Suite 3W8  
Lake Success, N.Y. 11042

*Re: IME Watchdog, Inc. v. Gelardi, et al.*  
*Case No.: 1:22-cv-1032 (PKC)(JRC)*

Dear Mr. Felsen:

Please be advised that this office represents Eugene Liddie, a non-party in the above matter for the limited purpose of providing representation with respect to his testimony and responding to the Subpoena Duces Tecum served upon him on May 29, 2024 by your office. This office has reviewed the subpoena and we have discussed the same with our client.

On behalf of Eugene Liddie and IME Legal Reps, he responds as follows:

1. Mr. Liddie states that he has no communications, including but not limited to, text messages and/or emails between himself on the one hand, and Jeff Beiben, Safa Gelardi, and/or Vito Gelardi on the other hand related to IMEs and the operation of his IME business.
2. IME Legal Reps is the only business owned and operated by Eugene Liddie.
3. See below are/were the names of the customers of IME Legal Reps:  
Rosenbaum & Rosenbaum  
Ginarte, Gonzalez, Winograd LLP  
The Rizzuto Law Firm  
Bergman, Bergman, Fields & Lamonoffs LLP  
Zemsky and Salomon, P.C.  
Chernyy and Associates  
Martin Ginsberg Firm  
Kohan Law  
The Law Office of Marshall Inwood  
The Law Office Glenys M Rosario Esq.

G Wesley Simpson , P.C.  
Jacobson Law

\*Mr. Liddie respectfully requests that these names be held in confidence and that his customers not be contacted in an effort to interfere with his client relationships.

4. Please see attached.

Other than this document, Mr. Liddie was unable to locate any documents related to the request within paragraph "4" of your subpoena. Moreover, the website of IME Legal Reps was hacked in May of 2024 wherein no such documents or data related to the website in question are retrievable.

Eugene Liddie completed a search of his records with due diligence, and he has not yet located any documents in his possession to fulfill the requests within Paragraphs 1-4 of your subpoena.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'K. Charrington', with a long horizontal flourish extending to the right.

Karen H. Charrington, Esq.



## WEBSITE SALES AGREEMENT

This Website Sales Agreement (the "Agreement") is made effective on this 10 day of April, 2023, by and between Vito and Safa Gelardi of IME Companions.com (the "Seller"), and Eugene Liddie of IMElegalreps.com (the "Buyer").

### WEBSITE SALE

Subject to the terms and conditions contained in this Agreement the Seller hereby sells and transfers to the Buyer the any and all of Seller's right, title and interest in and to the Website IMECompanions.com (the "Website") and any other rights associated with the Website, including, without limitation, any intellectual property rights.

### PAYMENT TERMS

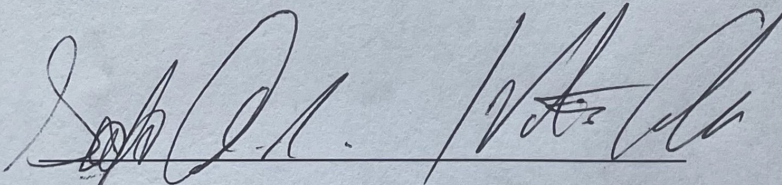
In consideration for the sale of the Website the Buyer agrees to pay the Seller the amount of \$ 4,300.00. This amount shall be paid within 5 business days from the date of this Agreement. In the event if Buyer fails to make the payment, this Agreement may be cancelled by the Seller at the Seller's sole discretion.

### DISCLAIMER

SELLER EXPRESSLY DISCLAIMS ALL WARRANTIES OF ANY KIND, WHETHER EXPRESS OR IMPLIED, INCLUDING BUT NOT LIMITED TO THE IMPLIED WARRANTIES OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE AND NON-INFRINGEMENT.

### REPRESENTATIONS AND WARRANTIES BY THE SELLER

- a) The Seller has all necessary right, power, and authorization to sign and perform all the obligations under this Agreement.
- b) The Seller has the exclusive ownership of the Website and there are no disputes with any third party over the proprietary rights to the Website.



Sellers/ Vito and Safa Gelardi

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Buyer/Eugene Liddie